

15 October, 2005

In the United States Bankruptcy Court for the District of Delaware

W.R. Grace and Co. et al debtor

Chapter 11  
Case No. 01-01139 (JFK)  
(Jointly Administered)

Re: Debtor's Fifteenth Omnibus Objection (substantive) To Asbestos Property Damage Claims

Woodbury Place Apartments claimant #2763  
2834 Woodbury Dr., San Antonio, Tx, 78217 (location)  
3942 Pleasure Hill, San Antonio, Tx. 78229 (mailing address)

Contact information:

Alfred V. Williams, President Tamale Blanca, General Partner for Woodbury Place Apts., Ltd.  
210-344-5245

Basis for the amount of the claim is based on a bid of \$217,000.00 to remove all existing asbestos from the apartment complex. This bid was five years ago, and I can obtain a new bid if necessary.

The claim objections are as follows:

C-3 (D)  
C-3 (F)  
D-2  
D-3  
D-4  
D-6

C-3 (D)- Find enclosed an exhibit from Astex Inc., a licensed environmental consulting firm. This document confirms the use of asbestos (a known Grace, et al, product) in this building complex.

C-3 (F)- As the submitted exhibit shows, this was not some bulk sample, but a sample from a specific area in a specific apartment unit. This unit is representative of all 81 units as well as 3 separate laundry rooms.

D-2 - claim amount is listed above. If a court approved Asbestos Property Damage Proof of Claim Form felt that a claim amount notice wasn't necessary at the time the claim was timely submitted, why should the claim now be rejected on that basis?

D-3- claim amount is listed above. When one buys a property, one does not sign away their rights. If the property is damaged, it should be corrected. I did not receive a discount because the property had asbestos.

D-4- claim amount is listed above. This is a federal lawsuit and state statute of limitations do not apply. My proof of claim form was timely filed under applicable federal law, (see enclosed certified mail return receipt).

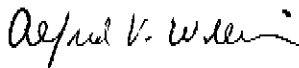
D-6- claim amount is listed above. There was no delay. The proof of claim form was timely filed. A timely filing does not unreasonably prejudice Grace, et al.

E-1- claim amount is listed above. Am not claiming asbestos levels in the air. When the building is no longer habitable and has to be demolished it is going to cost an extra \$217,000.00 (based on a bid 5 years ago) to comply with federal regulations for the handling of asbestos. I contacted Grace about their new

process to neutralize the asbestos but. I was informed the process wouldn't work due to the sequestration of the asbestos deep in the material.

Am requesting the court's indulgence to allow a new bid on the cost of asbestos removal if this is requested, and to allow new facts to be introduced as they are discovered.

Thank you,

A handwritten signature in cursive script, appearing to read "Alfred V. Williams".

Alfred V. Williams



**ASTEX, INC.**  
ENVIRONMENTAL CONSULTANTS

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**CONCLUSIONS**

After a careful review and a walk through inspection of buildings along with a drive by and research of the area within a 1 mile radius, the following conclusions have been drawn by the appraisal team:


**Asbestos** - It is being assumed that all ceiling stipple material is ACM. HVAC closets appear to be clean. Incandescent light fixtures could contain ACM heat shields. Mechanical rooms appear to be clean.

**Waste Disposal** - No evident waste disposal problems or high risk neighbors in the area near the complex.

**Radon** - The possibility of radon gas contamination is not likely.

**Underground Storage Tank** - There are no UST's on this property or in the immediate area around the property.

**Polychlorinated Biphenyls (PCB)** - At least 2 transformers in area show evidence of some past or present leakage.

  
Enrique Delgado  
Industrial Hygienist  
Vice President

ED/kdh

ASTEX, INC.  
ENVIRONMENTAL CONSULTANTS

RECEIVED JAN 19 1989

January 12, 1989

Mr. Mike Lynd  
MLR Inc  
5710 NW Expressway  
San Antonio, TX 78201

Dear Mike:

Enclosed herein are the results and opinions of a Phase I, walk through Environmental Liability Assessment study conducted at "The Woodbury Place" apartment complex in San Antonio, Texas.


The 5 hazards screened were asbestos, waste disposal, radon, underground storage tanks, and polychlorinated biphenyls (PCB).

The screening was conducted by Mr. Enrique Delgado and Mr. Ron Greenberg, both of Astex, Inc. Mr. Delgado's credentials are included in this report.

We appreciate the opportunity to work with you on this project and look forward to serving you again in the near future. If you have any questions concerning this report, please call.

Sincerely,

ASTEX, INC. by

  
Enrique Delgado  
Industrial Hygienist  
Vice President

RG/kdh

  
Ron Greenberg  
President

ENVIRONMENTAL MONITORING SERVICE, INC.  
ANALYTICAL SERVICES LABORATORY  
ASBESTOS IDENTIFICATION REPORT OF ANALYSIS

DATE 9/23/88CUSTOMER Walnut Grove Apt. - purchased

potential

ANALYST Don Dopheche

| SAMPLES                               | ANALYST | APPEARANCE | SAMPLE WEIGHT | ANALYST                           | TOTAL SAMPLES | PERCENT MATTER       | IDENTIFICATION                |
|---------------------------------------|---------|------------|---------------|-----------------------------------|---------------|----------------------|-------------------------------|
| W08Y                                  |         |            |               |                                   |               |                      |                               |
| #1104                                 | 2       | 3-white    | 1             | 2-5%<br>5% chrysotile<br>Asbestos | 5%            | 3-5%<br>5% cellulose | 1-90%<br>filler-binder<br>90% |
|                                       |         |            |               |                                   |               |                      |                               |
|                                       |         |            |               |                                   |               |                      |                               |
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| ANALYTICAL METHOD                     |         |            |               |                                   |               |                      |                               |
| 1. POLARIZED LIGHT MICROSCOPY (PLM)   |         |            |               |                                   |               |                      |                               |
| 2. X-RAY DIFFRACTION                  |         |            |               |                                   |               |                      |                               |
| 3. SEM/EDS                            |         |            |               |                                   |               |                      |                               |
| 4. TEM/EDS                            |         |            |               |                                   |               |                      |                               |
| 5. XRF                                |         |            |               |                                   |               |                      |                               |
| 6. ICP-AES                            |         |            |               |                                   |               |                      |                               |
| 7. GC/MS                              |         |            |               |                                   |               |                      |                               |
| 8. HPLC                               |         |            |               |                                   |               |                      |                               |
| 9. TGA                                |         |            |               |                                   |               |                      |                               |
| 10. DSC                               |         |            |               |                                   |               |                      |                               |
| 11. FTIR                              |         |            |               |                                   |               |                      |                               |
| 12. Raman                             |         |            |               |                                   |               |                      |                               |
| 13. Laser Raman                       |         |            |               |                                   |               |                      |                               |
| 14. Laser Raman Mapping               |         |            |               |                                   |               |                      |                               |
| 15. Laser Raman Spectroscopy          |         |            |               |                                   |               |                      |                               |
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| 100. Laser Raman Spectroscopy Mapping |         |            |               |                                   |               |                      |                               |

NON-ASBESTOS MATERIALS  
IDENTIFICATION  
1. PLASTER  
2. PUTTY  
3. PLASTER  
4. VERMICULITE  
5. PAINT  
6. QUARTZ DUST  
7. TIE  
8. DIRT

CONTAMINANT MATERIALS  
IDENTIFICATION  
1. AMIANTH  
2. ANTHRACITE  
3. CHRYSOLE  
4. CROCIDOLITE  
5. CROCIDOLITE  
6. CROCIDOLITE

ASBESTOS PRESENT  
IDENTIFICATION  
1. CHRYSOLE  
2. CROCIDOLITE  
3. CROCIDOLITE  
4. CROCIDOLITE

SAMPLE TREATMENT  
IDENTIFICATION  
1. MONITORING  
2. MONITORING  
3. MONITORING  
4. MONITORING  
5. MONITORING

OTHER SAMPLE APPEARANCE  
IDENTIFICATION  
1. MONITORING  
2. MONITORING  
3. MONITORING  
4. MONITORING  
5. MONITORING  
6. MONITORING  
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8. MONITORING  
9. MONITORING  
10. MONITORING

ANALYTICAL METHOD  
IDENTIFICATION  
1. POLARIZED LIGHT MICROSCOPY (PLM)  
2. PLM - CONFIRMATION  
3. X-RAY DIFFRACTION

DEF: COMPLETE THIS SECTION

Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits.

Title Addressed to:

Claims Processing Agent  
R. Grace & Co. Bankruptcy  
D. Box 1620  
Aribauett  
IN. 55021-1620

A. Received by (Please Print Clearly) **Received by**  
B. Date of Delivery **2-13-03**  
C. Signature **Post Consulting, Inc.**  
☒ Agent  
☐ Addressee  
D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☒ No

3. Service Type  
☒ Certified Mail ☐ Express Mail  
☐ Registered ☐ Return Receipt for Merchandise  
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

Article Number **7001 2510 0002 9078 8262**

Form 3811, March 2001

Domestic Return Receipt

102595-01-44-1424

In Re: **W. K. Grace & Co., et al., Case No. 01-01139 (JFK)**

### Confirmation of Receipt of Claim Form

We have received your completed Proof of Claim Form. Your claim has been assigned the claim number **01-01139-0002** that appears on the front of this card, above your name. Bring with the Claim Form a copy of the:

If you have any questions about your claim, you may call the Claims Agent toll-free from the United States, Canada, and Puerto Rico at 1-800-432-1989.

If your address changes at any time during the claims period, you must notify the Claims Agent in writing at Claims Agent, Re: **W. K. Grace, P.O. Box 1620, Fairland, MD 21031-1620**. Please include your full name, claim number and signature on all correspondence.

Sincerely,

Claims Agent

If you are calling from another country, you may make a toll call to the United States at 1-807-233-4361.